
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Cheryl Sagataw, DeAnthony
Barnes, Roberta Strong, and
Travis Neloms, *on behalf of
themselves and a class of similarly
situated individuals,*

Ct. File No. 24-cv-00001(ECF/TNL)

Plaintiffs,

DECLARATION OF JOHN
RICHARD

v.

Mayor Jacob Frey, *in his individual and
official capacity.*

Defendant.

Your Declarant is John Richard, and he submits the following declaration:

1. I live in a home that was next to the Nenookaasi encampment when it was located at 26th Street and 14th Avenue South.
2. The Nenookaasi encampment existed at this location from approximately January 4, 2024 until it was closed on January 30, 2024. During this time, the encampment had a significant negative impact on me.
3. The encampment typically had 18-20 fires burning at any given point. This generated an incredible amount of smoke in the neighborhood.

4. I am 70 years old, and I have a compromised immune system. The smoke produced by the encampment negatively impacted my health and caused me significant discomfort.
5. Smoke was regularly visible in the air, and the smell of smoke permeated my home. This impact of the smoke was so bad that I made a complaint to the Environmental Protection Agency.
6. During the time that the Nenookaasi encampment was located at 26th Street and 14th Avenue South, I found human feces in my driveway on three separate occasions. This occurred despite the fact that there were multiple porta-potties at the encampment site.
7. Having human waste on my property was extremely disturbing in general, but my safety concerns were even more heightened knowing that there was a virus outbreak at the encampment. I was concerned for my personal health and safety.
8. During the time that the Nenookaasi encampment was located at 26th Street and 14th Avenue South, I heard gunshots in the middle of the night on multiple occasions.
9. During the time that the Nenookaasi encampment was located at 26th Street and 14th Avenue South, on two occasions I was awoken by the sounds of men beating women at the encampment.

10. During the time that the Nenookaasi encampment was located at 26th Street and 14th Avenue South, there were frequently used hypodermic needles strewn around the neighborhood and on my property.

11. I declare under penalty of perjury that everything I have stated in this declaration is true and correct. Signed in Hennepin County, Minnesota.

Dated: 2/29/24

/s/ John Richard
John Richard